

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	Chapter 11
TS EMPLOYMENT, INC.,	No. 15-bk-10243-mg
Debtors.	No. 18-ap-1649-mg
JAMES FELTMAN, not individually but solely as chapter 11 trustee for TS Employment, Inc.,	<b><u>NOTICE OF DEFENDANTS' MOTION TO WITHDRAW THE BANKRUPTCY REFERENCE</u></b>
Plaintiff,	
- against -	
KOSSOFF & KOSSOFF LLP and IRWIN KOSSOFF,	
Defendants.	

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and declaration of Jeffrey Chubak, both dated August 27, 2019, the above-named Defendants move this Court for an order withdrawing the reference of the above-captioned adversary proceeding to the Bankruptcy Court for purposes of trial on completion of discovery, pursuant to 28 U.S.C. § 157(d), and for such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1(b), opposition papers must be served within fourteen days following service of Defendants' moving papers.

Dated: August 27, 2019  
New York, New York

STORCH AMINI PC

/s/ Jeffrey Chubak  
Steven G. Storch  
Jeffrey Chubak  
140 East 45<sup>th</sup> Street, 25<sup>th</sup> Floor  
New York, New York 10017  
(212) 490-4100  
sstorch@storchamini.com  
jchubak@storchamini.com  
*Attorneys for Defendants Kossoff & Kossoff  
LLP and Irwin Kossoff*